

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Denise M Stanley

Write the full name of each plaintiff.

22 cv 6711

(Include case number if one has been assigned)

-against-

Do you want a jury trial?

AA M 15 Residence Inn by Marriott
Yonkers

☐ Yes ☒ No

Write the full name of each defendant. The names listed above must be identical to those contained in Section I.

EMPLOYMENT DISCRIMINATION COMPLAINT

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. PARTIES**A. Plaintiff Information**

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Denise M Stanley
 First Name Middle Initial Last Name
55 Mill Plain Rd, Unit 33-9
 Street Address
Fairfield Cnty, Danbury CT 06811
 County, City State Zip Code
914-806-2587 denise.stanley@gmail.com
 Telephone Number Email Address (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. (Proper defendants under employment discrimination statutes are usually employers, labor organizations, or employment agencies.) Attach additional pages if needed.

Defendant 1: AAM 15 Residence Inn by Marriott Yonkers
 Name
One International Place, Suite 2000
 Address where defendant may be served
Boston MA, 02110
 County, City State Zip Code

Defendant 2:

Name
 Address where defendant may be served
 County, City State Zip Code

Defendant 3:

Name

Address where defendant may be served

County, City

State

Zip Code

II. PLACE OF EMPLOYMENT

The address at which I was employed or sought employment by the defendant(s) is:

Residence Inn By Marriott Yonkers

Name

7 Executive BLVD

Address

Westchester County, Yonkers NY 10701

County, City

State

Zip Code

III. CAUSE OF ACTION**A. Federal Claims**

This employment discrimination lawsuit is brought under (check only the options below that apply in your case):

- ☒ **Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e to 2000e-17, for employment discrimination on the basis of race, color, religion, sex, or national origin**

The defendant discriminated against me because of my (check only those that apply and explain):

☒ race:Denied Promotion because of my Race☒ color:Denied Promotion because of my Color☐ religion:☒ sex:Denied Promotion because of my Gender☐ national origin:

- ☒ **42 U.S.C. § 1981**, for intentional employment discrimination on the basis of race

My race is: African American

- ☐ **Age Discrimination in Employment Act of 1967**, 29 U.S.C. §§ 621 to 634, for employment discrimination on the basis of age (40 or older)

I was born in the year: _____

- ☐ **Rehabilitation Act of 1973**, 29 U.S.C. §§ 701 to 796, for employment discrimination on the basis of a disability by an employer that constitutes a program or activity receiving federal financial assistance

My disability or perceived disability is: _____

- ☐ **Americans with Disabilities Act of 1990**, 42 U.S.C. §§ 12101 to 12213, for employment discrimination on the basis of a disability

My disability or perceived disability is: _____

- ☐ **Family and Medical Leave Act of 1993**, 29 U.S.C. §§ 2601 to 2654, for employment discrimination on the basis of leave for qualified medical or family reasons

B. Other Claims

In addition to my federal claims listed above, I assert claims under:

- ☒ **New York State Human Rights Law**, N.Y. Exec. Law §§ 290 to 297, for employment discrimination on the basis of age, race, creed, color, national origin, sexual orientation, military status, sex, disability, predisposing genetic characteristics, marital status
- ☐ **New York City Human Rights Law**, N.Y. City Admin. Code §§ 8-101 to 131, for employment discrimination on the basis of actual or perceived age, race, creed, color, national origin, gender, disability, marital status, partnership status, sexual orientation, alienage, citizenship status
- ☐ Other (may include other relevant federal, state, city, or county law):

IV. STATEMENT OF CLAIM

A. Adverse Employment Action

The defendant or defendants in this case took the following adverse employment actions against me (check only those that apply):

- ☐ did not hire me
- ☐ terminated my employment
- ☒ did not promote me
- ☐ did not accommodate my disability
- ☒ provided me with terms and conditions of employment different from those of similar employees
- ☐ retaliated against me
- ☐ harassed me or created a hostile work environment
- ☒ other (specify): Violated their own Core Values
Gender Discriminated

B. Facts

State here the facts that support your claim. Attach additional pages if needed. You should explain what actions defendants took (or failed to take) *because of* your protected characteristic, such as your race, disability, age, or religion. Include times and locations, if possible. State whether defendants are continuing to commit these acts against you.

AA15 - Shows a statistical trend of unfair practices,
hiring and promoting Minorities and people of color to
Front End/Front Office Management Positions. In
particular to my Charge, AA15 Do not Promote African
Females to White Collar positions. Their consistent
Reason for Denial is "NOT ENOUGH EXPERIENCE"
See Attached Facts.

As additional support for your claim, you may attach any charge of discrimination that you filed with the U.S. Equal Employment Opportunity Commission, the New York State Division of Human Rights, the New York City Commission on Human Rights, or any other government agency.

V. ADMINISTRATIVE PROCEDURES

For most claims under the federal employment discrimination statutes, before filing a lawsuit, you must first file a charge with the U.S. Equal Employment Opportunity Commission (EEOC) and receive a Notice of Right to Sue.

Did you file a charge of discrimination against the defendant(s) with the EEOC or any other government agency?

☒ Yes (Please attach a copy of the charge to this complaint.)

When did you file your charge?

EEOC

☐ No

Have you received a Notice of Right to Sue from the EEOC?

☒ Yes (Please attach a copy of the Notice of Right to Sue.)

What is the date on the Notice?

5/6/22

When did you receive the Notice?

5/6/22

☐ No

VI. RELIEF

The relief I want the court to order is (check only those that apply):

- ☐ direct the defendant to hire me
- ☐ direct the defendant to re-employ me
- ☐ direct the defendant to promote me
- ☐ direct the defendant to reasonably accommodate my religion
- ☐ direct the defendant to reasonably accommodate my disability
- ☒ direct the defendant to (specify) (if you believe you are entitled to money damages, explain that here)

I Worked at Residence Inn By Marriott for Eight Plus years. I Am better Familiar with the culture OF The Hotel than Any Outsider. At the time I was denied promotion By AAM15, See Attached Relief

VII. PLAINTIFF'S CERTIFICATION

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

8/4/2022
 Dated
Denise M Stanley
 First Name Middle Initial Last Name
55 Mill Plain Rd Unit 33-9
 Street Address
Fairfield County, Danbury CT 06811
 County, City State Zip Code
914-886-2587 denisestanley06@gmail.com
 Telephone Number Email Address (if available)

I have read the attached Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

Facts.

Some African American Employees, were treated unfairly, while others were denied promotion, but ASK to train newly Hired Caucasian for Management position.

AAM15 violated It's CORE values By ignoring It's Stated preferences: TO PROMOTE From within FIRST; TO TRAIN IT'S Employees

I was also not promoted Because of my sex. I am female. It was disclosed to me that AAM15 Preconcieved intent was to hire a male. There were two positions open for Front office Manager. AAM15 NOT only Hired two Males, but they were white Males.

All OF AAM15 Front Office Managers Are white. If A Minority held A Manager's position, they were not treated the same.

Base upon the Job Listing on Indeed, I more than qualified.

RELIEF

I was working Three Jobs. The combine salary of All three Jobs did not equal The salary For the Front Office Manager Position That I was denied By AAM15. The position, had I been promoted would have been a Major and long time coming Career move For Me. I would Also not have to work 3 Jobs Anymore, Thus giving me more time for Family And Friends. I would Like the Court to order AAM15 TO compensation in the Amount of \$115,000.00. This is derived from the salary of \$60,000, (Annually), offered By AAM15 for the Front Office Manager Position minus My the difference of My salary at time of The denial multiplied By Five The Five years I would have had to work until Full Retirement Age of 67.



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

New York District Office
33 Whitehall St, 5th Floor
New York, NY 10004
(929) 506-5270
Website: www.eeoc.gov

DETERMINATION AND NOTICE OF RIGHTS

(This Notice replaces EEOC FORMS 161 & 161-A)

Issued On: 05/06/2022

To: Ms. Denise M. Stanley
55 Mill Plain Road, Unit 33-9
DANBURY, CT 06811
Charge No: 520-2021-02598

EEOC Representative and email: Michael Woo
Investigator
michael.woo@eeoc.gov

DETERMINATION OF CHARGE

The EEOC issues the following determination: The EEOC will not proceed further with its investigation and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.

NOTICE OF YOUR RIGHT TO SUE

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file a lawsuit based on this charge, please sign-in to the EEOC Public Portal and upload the court complaint to charge 520-2021-02598.

On behalf of the Commission,

Digitally Signed By: Judy Keenan
05/06/2022

Judy Keenan
District Director

Cc:

Kelly Correia
kcorreia@aam15.com

Terence McCourt
Greenberg Traurig
mccourt@gtlaw.com

Amanda Carney
Greenberg Traurig
carneya@gtlaw.com

Please retain this notice for your records.